

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC, 20554

In the Matter of                    )  
Creation of a Low                )  
Power Radio                    )  
Service                            )

MB Docket No. 99-25

My name is Eric Howland, and I strongly support any actions the Federal Communications Commission can take to expand and support the Low Power FM radio service.

I recently visited the launching of a new Low Power FM (LPFM) station in Massachusetts and was impressed with both the depth of commitment provided by the core group developing the station and the breadth of support evident from their community. These volunteers are creating an asset in their community.

I am helping to create a similar station in my hometown. I am daunted by the task ahead of us. By the time we are on the air, volunteers will have donated thousands of hours of time and thousands of dollars in contributions to create the station. These stations are not like the commercial stations. In order to survive, they need to be deeply supported by their communities. When this happens they provide a unique asset to their communities.

The FCC is to be commended both for realizing that the LPFM radio service would increase the diversity of broadcasting in a wide variety of communities and also for establishing rules that will foster this diversity. However, for this radio service to meet these goals some of the current rules need to be retained and others modified.

To keep the service fulfilling its purpose it needs:

1. PROTECTION FROM TRANSLATORS. The original local programming that these stations are rightly required to provide should have priority over additional channels of national programming. In those locations where channels are scarce, there are already many commercial stations. The best solution is to classify the LPFM service as a full primary status service. Failing that, the modified primary status of LPFM should take precedence over translators. Also I understand roughly 1,000 translator permits that have been granted since the first window for LPFM licenses applications was opened. These should be re-examined for interference with LPFM license applications and denied if conflicts are found.

2. PROTECTION FROM ENCROACHMENT BY FULL POWER STATIONS. Full Power FM stations should not be able to modify their operations to curtail the operation of LPFM stations. And if modifications are made that affect the operations of LPFM stations, the Low Power Stations should be able to make major revisions in their applications to reduce the impact of these changes on their stations.

3. PROTECTION FROM NATIONAL ORGANIZATIONS CREATING NETWORKS OF SMALL STATIONS: PART 1: The local character of the LPFM stations must be assured to preserve this service as an alternative to national networks. A station with no studio, no local volunteers, and nothing but a satellite downlink should not be allow to operate under this service. Only Local stations should be licensed under this service. The localism requirements should remain in force and be non-waverable, although the 10 mile rule might be extended in rural areas to 30 or 50 miles.

4. PROTECTION FROM NATIONAL ORGANIZATIONS CREATING NETWORKS OF SMALL STATIONS: PART 2: Ownership of multiple LPFM stations should not be allowed. This is similar to point 1. The goal of the LPFM service is not to duplicate existing radio services. Recreating the national networks with many small stations does not serve the goals for this unique service. Similarly allowing the sale of LPFM licenses should be prohibited, as it creates the possibility of application for licenses for financial speculation while doing nothing to ensure that the local quality of the stations are preserved.

On the other hand volunteer boards, especially new boards, often have fairly rapid turnover of directors. Reasonable changes in boards of directors should be allowed as long as the purpose of the stations remains constant.

Thank you for the opportunity to comment on the proposed rules.

Sincerely,

Eric Howland.